UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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ENCOMPASS INSURANCE COMPANY OF MASSACHUSETTS,

C.A. NO. 05-11693 RCL

Plaintiff,

v.

JOSEPH D. GIAMPA, FREDERICK T. GIAMPA ADVANCED SPINE CENTERS, INC. d/b/a FIRST SPINE & REHAB, FUTURE MANAGEMENT CORPORATION, EDWARD KENNEDY, BRIAN CULLINEY and JENNIFER McCONNELL,

Defendants.

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AFFIDAVIT OF JENNIFER L. MCCONNELL

I, Jennifer L. McConnell, being duly sworn, do hereby depose and say as follows:

1. My name is Jennifer L. McConnell. I am a resident of Dedham, Massachusetts. Unless otherwise stated, I make the following statements from my own personal knowledge.

2. In May 2006, I resigned my position as a practicing chiropractor in the employ of the defendant, Future Management Corporation ("Future Management"), in which capacity I had previously provided chiropractic services at the defendant Advanced Spine Centers, Inc. d/b/a First Spine & Rehab.

3. I left Future Management to join Parexel International in my current position as a Senior Drug Safety Specialist. Generally, my responsibilities as a Senior Drug Safety Specialist are to monitor and report the experience of significant medical events by participants in drug and medical device trials. My responsibilities as a Senior Drug Safety Specialist do not include practicing chiropractic medicine of any kind, nor

do they include the billing of insurance companies. A true and accurate copy of a current job posting for a Senior Drug Safety Specialist with Parexel International, which posting accurately describes my own job responsibilities, is attached hereto as Exhibit A.

4. Since I resigned from Future Management in May 2006, I have not engaged in the professional practice of chiropractic medicine, nor do I presently intend to engage in such practice in the future.

5. Earlier this year, I chose not to renew my chiropractic license, causing it to expire on March 31, 2008. A true and accurate copy of my listing with the Massachusetts Board of Professional Licensure reflecting my chiropractic license as "Expired" is attached hereto as Exhibit B.

6. When I resigned from Future Management, I severed all ties with Future Management and First Spine, and since that time I have had almost no contact with the other individual defendants regarding matters other than this litigation.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 10th DAY OF JULY 2008.

_____
Jennifer L. McConnell

Certificate of Service

I hereby certify that on this 10th day of July, 2008, this document filed through the ECF system pursuant to Local Rule 5.4 will be sent electronically to counsel of record for all other parties.

___/s/ Thomas M. Ciampa____

do they include the billing of insurance companies. A true and accurate copy of a current job posting for a Senior Drug Safety Specialist with Parexel International, which posting accurately describes my own job responsibilities, is attached hereto as Exhibit A.

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Jennifer L. McConnell

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___/s/ Thomas M. Ciampa____

EXHIBIT A

Career Opportunities

| My Career Center | View Job Cart | Back to Search Page |

Title: Senior Drug Safety Specialist
Division: CRS
Department: Medical
Location: EU - United Kingdom - Uxbridge
Hiring Manager: Tara Ferguson
Recruiter: Juana Winter
Employee Referral Level: Level 2

Description:

The Senior Drug Safety Specialist will be the project lead and provide technical and process-related expertise to drug safety management (clinical trial and post-marketed) and medical monitoring activities, ensuring compliance with relevant regulations and Standard Operating Procedures (SOPs).

The Key Accountabilities will include Lead and manage projects including the development of project specific safety reporting procedures and workflows and provide guidance to the team on the procedures; Develop project specific safety database customization and data entry guidelines; Participation in signal generation activities; Triage of incoming reports for completeness, legibility and validity; Initial data entry of case reports into safety database / tracking system; Assessment of case reports for seriousness, causality and expectedness; Requesting follow-up i.e. written, telephone; Adverse event (AE) and drug coding; Writing case narratives; Ensuring relevant case reconciliation; Provision of line listings and tabulations for safety reports i.e. periodic safety reports, ad hoc safety reports etc; Quality control of case reports, line listings and tabulations; Ensuring the maintenance of local drug safety reporting requirements; Regulatory authority reporting (electronic and hard copy); Literature reviews.

Experience:

- Education: Degree in Pharmacy, Nursing, Life Science, or other health-related field, or equivalent qualification; Associates/diploma degree in any of the above with appropriate work experience.
- Minimum Work Requirements: Related experience gained in a healthcare environment.
- Skills: Clear understanding of drug safety and the drug development process; Analytical and problem solving skills; Excellent interpersonal skills; Excellent verbal / written communication skills; Time management skills; Team player; Client focused approach to work; Experience with computer applications including database management; Fluent English.

Add to Job Cart

EXHIBIT B

The Official Website of the Office of Consumer Affairs & Business Regulation (OCABR)

Division of Professional Licensure

Mass.Gov

Check A Professional License

By the Division of Professional Licensure

LICENSEE

Name: JENNIFER L. MCCONNELL
DEDHAM, MA

NEW SEARCH

Licensing Board:	CHIROPRACTORS
License Type:	CHIROPRACTOR
License Number:	2171
Status:	EXPIRED - WITHIN 1 RENEWAL CYCLE
Expiration Date:	3/31/2008
Issue Date:	9/18/1997
Exam Date:	
School:	NEW YORK

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